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January 15, 2002

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By E-Mail to FR0001@ustr.gov

Ms. Gloria Blue
Executive Secretary, TPSC
Office of the U.S. Trade Representative
600 Seventeenth Street, N.W.
Washington, DC 20508

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Re: *Potential Action Under Section 203 of the Trade Act of 1974 With Regard to Imports of Certain Steel – Supplemental Information on Request to Exclude Chromate-Free Corrosion Resistant Steel (X-181) from Any Import Restrictions*

Dear Ms. Blue:

Pursuant to the Trade Policy Staff Committee's (TPSC's) October 26, 2001 notice concerning comments on possible Presidential remedy actions in the pending safeguards investigation of certain steel products, we are submitting the enclosed additional information on the request for the exclusion of chromate-free corrosion resistant steel (X-181). *See Trade Policy Staff Committee; Public Comments on Potential Action Under Section 203 of the Trade Act of 1974 With Regard to Imports of Certain Steel*, 66 Fed. Reg. 54,321 (Oct. 26, 2001). This information, as set forth below, revises the definition of chromate-free corrosion-resistant steel.

Ms. Gloria Blue
Executive Secretary, TPSC
January 15, 2002
Page 2

Public Document

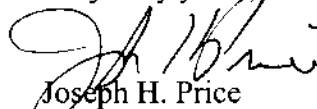
**REVISED DEFINITION
CHROMATE-FREE CORROSION-RESISTANT STEEL (X-181)**

Electrogalvanized (either pure zinc or zinc nickel) coated sheet, where

- (a) the electrogalvanized steel sheet is coated with a completely chromate-free coating (*i.e.*, containing no Cr³⁺ or Cr⁶⁺ ions) that is deposited from an aqueous dispersion containing thiocarbonyl group compounds, phosphate ions and silica, and
- (b) when subjected to Salt Spray conditions for 72 hours in accordance with the testing method prescribed by JIS Z2371, the electrogalvanized sheet has a rusted surface area ratio of 5% or less, and
- (c) the electrical conductivity of the electrogalvanized sheet has an interlaminar resistance value of 5 ohms per square centimeter or less, as measured by JIS C2550.

We note that Sony Electronics, Inc. filed a letter with your office earlier today providing further support for Sony's request to exclude a product with a chromate-free coating (X-176), including details on the environmental and health reasons for preferring a chromate-free product. If you have any questions or need additional information, please contact any one of the undersigned. Thank you for your assistance in the filing of this submission.

Very truly yours,



Joseph H. Price

Donald Harrison

Andrea Fekkes Dynes

Gregory C. Gerdes

GIBSON, DUNN & CRUTCHER LLP

Ms. Gloria Blue
Executive Secretary, TPSC
January 15, 2002
Page 3

Public Document

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